

IN RE: : Case No. 14-22312
Renee D. Short :
Debtor(s). : Chapter 13
Renee D. Short : Related to Doc. #: 89
Movant(s), :
v. RONDA J. WINNECOUR, :
Chapter 13 Trustee, :
Respondent(s). :

NOTICE OF PROPOSED MODIFICATION TO CONFIRMED CHAPTER 13 PLAN
DATED October 5, 2015

1. Pursuant to 11 U.S.C. § 1329, the Debtor has filed an Amended Chapter 13 Plan dated April 18, 2017 which is annexed hereto as Exhibit "A" (the "Amended Chapter 13 Plan"). Pursuant to the Amended Chapter 13 Plan, the Debtors seek to modify the confirmed Plan in the following particulars:
 - To change the monthly plan payment amount to \$1791.00 for the duration of the Chapter 13.
2. The proposed modification to the confirmed Plan will impact the treatment of the claims of the following creditors, and in the following particulars:
 - Bank of America, N.A.
3. Debtor submits that the reason for the modification is as follows:
 - To reflect the change in the new escrow payment per the Notice of Mortgage Payment Change filed with the Court at docket entry # 89
4. The Debtor submit that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtor further submits that the proposed modification complies with 11 U.S.C. §§ 1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the Debtor respectfully request that the Court enter an Order

and just.

Date: **April 18, 2017**

RESPECTFULLY SUBMITTED,

/s/ E. Vernon Parkinson

E. Vernon Parkinson, Esquire

PA I.D. No.: 77729

Attorney for the Debtor

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